



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

September 29, 2005

Jeffery C. Morris, PE
CH2M Hill
156 Grand Avenue
Suite 1000
Oakland, CA 94612

Re: February 11, 2005 Application for Risk Based Disposal Approval for Polychlorinated Biphenyls at Building 844 UL#01 Within Investigation Area C2 in the Eastern Early Transfer Parcel, Mare Island, Vallejo, California

Dear Mr. Morris:

EPA has received your application for risk based disposal approval of February 11, 2005. You seek a determination from EPA, in accordance with 40 CFR 761.61(c) and paragraph 6(a) of the Consent Agreement and Final Order (CA/FO) between the EPA and the Navy, City of Vallejo and Lennar Mare Island, that the site referenced above satisfies the standards for a risk-based disposal approval, and that no further action is required.

Building 844 UL#01 is an electrical distribution center which previously contained three transformers with PCBs. The PCB transformers were removed in 1985 and replaced with three non-PCB transformers. Of six samples collected from the pad, only one contained PCBs above the 1 mg/kg reporting limit, at a concentration of 2.1 mg/kg. The average PCB concentration, using half the reporting limit for the non-detect samples is 0.77 mg/kg.

CH2M Hill estimates the potential cumulative cancer risk for PCBs at this site to be 3×10^{-6} and the hazard index to be less than 1 under an industrial setting. EPA finds that the remaining PCB concentrations are in compliance with the alternative substantive cleanup requirements (SCRs) of paragraph 8(b)(2) of the CA/FO for concrete floors in industrial areas, where the maximum concentrations do not exceed 10 mg/kg and the average does not exceed 5 mg/kg, with a deed restriction limiting the property to industrial use. We are therefore making this determination under paragraph 8(b)(2) of the CA/FO rather than under 40 CFR 761.61(c).

You did not specify that you intend to place an industrial use deed restriction on the parcel in your February 11, 2004 letter. EPA cannot grant a 40 CFR 761.61(c) approval for these sites until the deed restriction is approved by EPA and recorded.

In addition, EPA has the following technical comment. On page 4 of your letter you state that dermal contact is not a likely exposure pathway for PCBs in concrete floors. EPA does not agree. While dermal contact with concrete floors may be unlikely, there have been reported cases of workers contaminating the floors of their homes with materials adhering to their shoes that they picked up in the workplace, to which young children in the home may be exposed. Please remove this assumption from future risk assessments.

Please feel free to contact Carolyn d'Almeida if you have any questions about this letter, or Michele Benson at (415) 972-3918 to discuss the deed restriction.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Johnson for". The signature is fluid and cursive, with the word "for" written in a smaller, simpler script at the end.

Kathleen Johnson
Chief
Federal Facilities and Site Cleanup Branch

c.c. Henry Chui, DTSC